



## O'MELVENY & MYERS LLP

LOS ANGELES  
CENTURY CITY  
IRVINE  
NEWPORT BEACH  
NEW YORK  
SAN FRANCISCO

1625 Eye Street, NW  
Washington, D.C. 20006-4001  
TELEPHONE (202) 383-5300  
FACSIMILE (202) 383-5414  
INTERNET: [www.omm.com](http://www.omm.com)

SILICON VALLEY  
TYSONS CORNER  
BEIJING  
HONG KONG  
LONDON  
SHANGHAI  
TOKYO  
OUR FILE NUMBER  
892,050-215

RECEIVED

OCT - 9 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WRITER'S DIRECT DIAL  
(202) 383-5382

WRITER'S E-MAIL ADDRESS  
[knewman@omm.com](mailto:knewman@omm.com)

October 9, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 02-359

Dear Ms. Dortch:

Enclosed for filing in the above-captioned proceeding are an original and four copies of the Rebuttal Testimony of Verizon Virginia Inc. In addition, we are enclosing eight copies for the arbitrator. In a separately sealed envelope we are also filing non-public versions of the Testimony of Michael Toothman/Steve Spencer and the Panel Testimony of Donald Albert, Peter D'Amico, Rosemarie Clayton and Alice Shocket. Thank you

Sincerely,

Kimberly A. Newman  
of O'Melveny & Myers LLP

cc: Stephen T. Perkins  
Martin W. Clift, Jr.  
Richard U. Stubbs  
Ms. Terri Natoli  
Mr. Jeremy Miller  
Mr. Brad Koerner  
Mr. Marcus Maher  
Mr. Richard Lerner  
Mr. John Adams  
Ms. Margaret Dailey

No. of Copies rec'd 0712  
List ABCDE

**BEFORE THE  
FEDERAL COMMUNICATION COMMISSION  
WASHINGTON, DC 20554**

**RECEIVED**

**OCT - 9 2003**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of )  
)  
Petition Cavalier Telephone, LLC )  
Pursuant to Section 252(e)(5) of )  
The Communications Act for )  
Preemption of the Jurisdiction of the )  
Virginia State Corporation Commission )  
Regarding Interconnection Disputes )  
With Verizon Virginia, Inc. and for )  
Arbitration . )  
\_\_\_\_\_ )

Docket No. 02-359

**REBUTTAL TESTIMONY OF VERIZON VIRGINIA, INC.**

Michael Glover  
of Counsel

Karen Zacharia  
Kathleen M. Grillo  
Verizon  
1515 North Court House Road  
5<sup>th</sup> Floor  
Arlington, VA 22201

Kimberly A. Newman  
James R. Young  
O'Melveny & Myers LLP  
555 13th Street, NW, Suite 500W  
Washington, DC 20006

**October 9, 2003**

Table of Contents to Rebuttal Testimony of Verizon Virginia Inc.  
October 9, 2003

Witness	Issue	Page Addressed
Louis Agro	C25	1-5
	C27	5-8
Donald Albert	C2	1-4
Rosemarie Clayton	C9	5-10
Peter D'Amico	C10	10-13
Alice Shocket	C14	13-20
	C27	20-23
William Green	C6	1-4
Thomas Maguire	C12	1-2
Gregory Romano	C25	1-2
Jonathan Smith	C3	1-8
	C4	8
	C5	8-9
	C17	10-11
	C21	11-15
	C24	15-17
Michael Toothman	C18	1-13
Stephen Spencer		
Alan Young	C16	1-4

**VERIZON VIRGINIA INC.**

**REBUTTAL TESTIMONY OF LOUIS AGRO**

**LIMITATION OF LIABILITY (ISSUE C25) AND  
UNE-RELATED CHARGES (ISSUE C27)**

**CC DOCKET NO. 02-359**

**OCTOBER 9, 2003**

**I. WITNESS BACKGROUND AND OVERVIEW**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.**

A. My name is Louis F. Agro. I am a Director in Wholesale Services. I am responsible for developing and supporting the implementation of performance assurance plans for wholesale services that Verizon provides to resellers and CLECs.

**Q. PLEASE DESCRIBE YOUR RELEVANT EXPERIENCE.**

A. I have worked in the telecommunications industry since 1995. Prior to assuming my current position in April 2000, I held positions of increasing responsibility in Wholesale Services. I received a Bachelor of Science in Mechanical Engineering from Rensselaer Polytechnic Institute in 1984; and a Master of Business Administration, with a concentration in Finance, from Fordham University in 1992.

**Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.**

A. I have read the Direct Testimony of David Whitt on Issue C25, and Marty Clift and Amy Webb on Issue C27. I will respond to their allegations about the effectiveness and complexity of the Virginia Performance Assurance Plan ("Virginia PAP").

**II. LIMITATION OF LIABILITY (ISSUE C25)**

**Q. AT PAGE 15 OF HIS DIRECT TESTIMONY, MR. WHITT STATES THAT "THE VIRGINIA PERFORMANCE ASSURANCE PLAN IS TOO COMPLEX, UNGAINLY, AND SUBJECT TO INTERPRETATION" TO PROVIDE VERIZON WITH AN INCENTIVE TO PERFORM ITS OBLIGATIONS UNDER THE INTERCONNECTION AGREEMENT. DO YOU AGREE?**

A. No, and neither do a number of state commissions. The PAP was initially developed by the staff of the New York Public Service Commission in a proceeding lasting several years in which input from CLECs and Verizon were considered. The PAP uses the

1 metrics and statistical methodologies that are developed in an ongoing proceeding in  
2 which the Staff of New York Public Service Commission, Verizon, and interested CLECs  
3 worked together to devise performance measurements for timeliness, reliability and  
4 quality of service. The Virginia SCC adopted the PAP in 2002 after receiving comments  
5 from a large number of CLECs.

6 The PAP has self-executing payments to CLECs that put hundreds of millions of dollars  
7 at risk annually if Verizon's wholesale performance falls below certain standards. The  
8 purpose of a PAP is to ensure that CLECs receive service at parity with Verizon's retail  
9 customers by penalizing Verizon for failure to provide such service. The New York PAP  
10 has been adopted in thirteen Verizon jurisdictions, including Virginia, as a deterrent to  
11 substandard service. The Commission has approved each state-specific PAP in Verizon's  
12 section 271 applications.

13 The Virginia PAP is admittedly complex because of its large number of performance  
14 measures. For example, the Virginia PAP contains measures that evaluate Verizon's  
15 overall wholesale performance as well as measures evaluating Verizon's performance for  
16 each individual CLEC. If the Virginia PAP were less complex, CLECs would  
17 undoubtedly dismiss it for being "simplistic." Finally, the fact that the Virginia PAP  
18 requires some sophisticated statistical analyses does not make it "subject to  
19 interpretation," as Mr. Whitt alleges. Quite the contrary, the Virginia PAP's statistical  
20 analyses provide certainty about how the PAP is applied.

1 **Q. HAS THE COMMISSION COMMENTED ON THE OVERALL**  
2 **EFFECTIVENESS OF THE PAP AS AN INCENTIVE FOR VERIZON TO**  
3 **PERFORM ITS OBLIGATIONS UNDER THE ACT?**

4 A. Yes. When the Commission approved Verizon's (then Bell Atlantic's) section 271  
5 application in New York, it stated:

6 "[W]e believe that the enforcement mechanisms developed in New York  
7 will be effective in practice. We base this predicative judgment on the fact  
8 that the plan has the following important characteristics:

- 9 • potential liability that provides a meaningful and significant incentive  
10 to comply with the designated performance standards;
- 11 • clearly articulated, pre-determined measures and standards, which  
12 encompass a comprehensive range of carrier-to-carrier performance;
- 13 • a reasonable structure that is designed to detect and sanction poor  
14 performance when it occurs;
- 15 • a self-executing mechanism that does not leave the door open to  
16 unreasonable litigation and appeal;
- 17 • and reasonable assurances that the reported data is accurate."

18 *New York § 271 Order ¶ 433.*

19 **Q. IS THE VIRGINIA PAP SIGNIFICANTLY DIFFERENT FROM THE NEW**  
20 **YORK PAP?**

21 A. No. While the Virginia PAP initially differed from the New York PAP in one small area,  
22 the benchmark for UNE flowthrough, the two PAPs now have exactly the same  
23 benchmarks. The only difference now between the New York and Virginia PAPs is the  
24 amount of money at risk. The Virginia PAP has somewhat less money at risk – although  
25 still hundreds of millions of dollars – than the New York PAP because Verizon Virginia  
26 is somewhat smaller than Verizon New York. Moreover, even before the Virginia PAP

1 benchmarks became identical to the New York PAP benchmarks, the Commission found  
2 that the Virginia PAP was effective in ensuring non-discriminatory treatment of CLECs:

3 “[W]e find that the Virginia Plan is reasonable to ensure an open local  
4 market in Virginia. We conclude that the Virginia Plan, in concert with  
5 the Virginia State Corporation Commission’s active participation in  
6 implementing modifications to promote the oversight of Verizon’s  
7 performance, provides sufficient assurance that Verizon will have a  
8 *compelling incentive* to maintain post-entry checklist compliance. We  
9 also note that *no party challenged the effectiveness of the plan.*”

10 *Virginia § 271 Order ¶ 198* (emphasis added; citations omitted).

11 **Q. HAS THE VIRGINIA SCC APPROVED THE VIRGINIA PAP?**

12 A. Yes. On July 18, 2002, the Virginia SCC approved the Virginia PAP for use in Virginia,  
13 effective October 1, 2002. *See Order, Establishment of a Performance Assurance Plan*  
14 *for Verizon Virginia Inc.*, PUC010226 (Va. SCC, Filed Nov. 1, 2001). In May of this  
15 year, the Virginia SCC approved revisions to the Virginia PAP that are now effective,  
16 making the Virginia PAP more demanding by adding more parity measures comparing  
17 Verizon’s treatment of CLEC and retail customers. *See Order Modifying and Approving*  
18 *Revisions to the Performance Assurance Plan of Verizon Virginia Inc. Filed March 7,*  
19 *2003*, PUC010226 (Va. SCC. May 14, 2003).

20 **Q. MR. WHITT ALSO COMPLAINS THAT THE VIRGINIA PAP WAS**  
21 **RECENTLY CHANGED. DOES THAT CHANGE UNDERMINE THE**  
22 **VIRGINIA PAP’S EFFECTIVENESS?**

23 A. No. As I noted above, the recent changes to the Virginia PAP made it more demanding  
24 by adding more measures of performance. In addition, the revised Virginia PAP  
25 allocates penalty payments made by Verizon between CLECs using unbundled loops and  
26 CLECs using UNE-platform. Mr. Whitt, at page 15 of his testimony, objects to this



1 allocation, claiming that too little is allocated to CLECs who use unbundled loops, as  
2 Cavalier does. In fact, however, the Virginia PAP now allocates a higher percentage of  
3 penalty payments to CLECs using unbundled loops than the New York PAP does.  
4 Cavalier and all other CLECs in Virginia had an opportunity to be heard on this change,  
5 and Cavalier filed comments objecting to the Virginia PAP's new allocation, but the  
6 Virginia SCC disagreed with Cavalier. Mr. Whitt does not provide any explanation why  
7 the Virginia PAP, as amended, is not effective at ensuring that Verizon provides services  
8 and facilities to CLECs in a non-discriminatory way.

### 9 **III. UNE-RELATED CHARGES (C27)**

10 **Q. ARE PERFORMANCE METRICS IN VIRGINIA "VERIZON'S OWN GRADING**  
11 **SYSTEM" WHICH VERIZON "CAN NEVER FAIL," AS MR. CLIFT**  
12 **CONTENDS ON PAGE 21 OF HIS TESTIMONY?**

13 A. No. As noted above, the concept of the PAP was originated in a proceeding where the  
14 Staff of the New York Public Service Commission developed the PAP structure,  
15 measurement methods, and payment calculations based on comments from Verizon and  
16 interested CLECs. The New York Public Service Commission staff continues to refine  
17 the PAP in ongoing proceedings that continue to consider comments from interested  
18 parties. The PAP ensures that CLECs receive service at parity with Verizon's retail  
19 customers by penalizing Verizon for failure to provide such service. As I've noted, the  
20 PAP has been adopted in thirteen Verizon jurisdictions, including Virginia, and the  
21 Commission has approved each state-specific PAP in Verizon's section 271 applications.  
22 Therefore, characterizing the PAP as "Verizon's own grading system" which therefore  
23 Verizon "can never fail" is absurd.

1 **Q. ARE THE MISSED APPOINTMENTS ABOUT WHICH MS. WEBB**  
2 **COMPLAINS AT PAGE 6 OF HER DIRECT TESTIMONY ALREADY**  
3 **COVERED BY THE VIRGINIA PAP?**

4 A. Yes. Ms. Webb complains about missed appointments and loops that were not properly  
5 delivered. The Virginia PAP covers all of these situations.

6 Specifically, the Virginia PAP measures Verizon's performance for Cavalier's customers  
7 and for Verizon's retail customers in the following categories. (The specific Virginia  
8 PAP provision numbers are shown in parentheses.)

- 9 • Percentage of Missed Installation Appointments (PR-4-04);
- 10 • Average Delay Days, measuring average time from the missed  
11 appointment to the actual installation of the loop (PR-4-02);
- 12 • Percentage of Installation Troubles Within 30 days, which includes  
13 loops reported as not working within 30 days after installation (PR-6-  
14 01);
- 15 • Percentage of Installation Troubles Within 7 days for Hot Cuts (PR-6-  
16 02);
- 17 • Percentage of On Time Performance for Hot Cuts (PR-9-01);
- 18 • Percentage of Missed Repair Appointments (MR-3-01);
- 19 • Mean Time to Repair (MR-4-02);
- 20 • Percentage of Lines Out of Service for More than 24 Hours (MR-4-  
21 08); and
- 22 • Percentage of Repeat Reports within 30 Days, involving situations  
23 where Cavalier reported trouble on a line, Verizon found no trouble,  
24 and Cavalier subsequently reported another trouble on the same line  
25 within 30 days and Verizon did find a trouble (MR-5-01).

1 **Q. ON PAGE 22 OF HIS DIRECT TESTIMONY, MR. CLIFT CLAIMS THAT**  
2 **VERIZON'S SATISFACTORY PERFORMANCE UNDER THE VIRGINIA PAP**  
3 **"DOES NOT MEAN ITS PERFORMANCE VIS-À-VIS CAVALIER IS**  
4 **SATISFACTORY." DOES THE VIRGINIA PAP CONTAIN CARRIER-**  
5 **SPECIFIC REMEDIES ?**

6 A. Yes. In addition to assuring satisfactory performance to CLECs in the aggregate, the  
7 PAP was designed to assure satisfactory performance vis-à-vis particular carriers. If  
8 Verizon does not meet a critical measure, such as PR-4-04, at the industry aggregate level  
9 in a given month (that is, if Verizon misses too many total CLEC appointments in one  
10 month), Verizon must make penalty payments to every CLEC that received substandard  
11 service. If, however, Verizon meets a critical measure, such as PR-4-04, at the industry  
12 aggregate level for two consecutive months, but nonetheless misses the measure in both  
13 months "vis-à-vis Cavalier," Verizon must pay penalties to Cavalier. Therefore, the  
14 carrier-specific remedies contained in the Virginia PAP are sufficient to address  
15 Cavalier's concerns, and there is no need for the additional layer of carrier-specific  
16 remedies Cavalier proposes.

17 **Q. HAS VERIZON MADE PAYMENTS TO CAVALIER PURSUANT TO THE**  
18 **MEASURES ABOUT WHICH MR. CLIFT COMPLAINS IN HIS DIRECT**  
19 **TESTIMONY?**

20 A. No. In fact, the most recent PAP Report (June 2003) shows that Verizon has provided  
21 Cavalier customers with a level of service that exceeds the benchmark standard set by the  
22 Virginia SCC. This same report also shows that, for all critical measures, Verizon  
23 provides Cavalier customers with a level of service that is always as good as, and  
24 generally exceeds, the level of service that Verizon provides its own retail customers.  
25 The PAP report for June 2003 is attached to my testimony as Exhibit A. Verizon's

1 performance with respect to the functions at issue in C27 is further proof that Cavalier's  
2 proposed contract language is unnecessary.

3 **Q. IS THERE ANY BASIS FOR MR. CLIFT'S SUSPICION THAT VERIZON IS**  
4 **NOT ACCURATELY REPORTING ITS PAP RESULTS, AS HE SUGGESTS ON**  
5 **PAGE 22 OF HIS DIRECT TESTIMONY?**

6 A. No. In connection with Verizon's section 271 application in Virginia, the Virginia SCC  
7 staff reported that it had been able to replicate Verizon's performance results successfully  
8 since the Fall of 2001 and that it continues to do so on an ongoing basis. *See* Testimony  
9 of Amy J. Gilmour, Virginia SCC Staff, Case No. PUC-2002-00046, at 1-5 (Va. SCC  
10 filed May 17, 2002) (App. C, Tab 11). Mr. Clift also complains that Verizon's reporting  
11 has never been audited. In fact, the first annual audit of Verizon's reporting accuracy  
12 under the Virginia PAP is taking place now, with the Liberty Group Consultants  
13 performing the audit.

14 **Q. DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY?**

15 A. Yes.

1                                   **Declaration of Louis F. Agro**  
2

3   I declare under penalty of perjury that I have reviewed the foregoing testimony and that those  
4   sections as to which I testified are true and correct.  
5

6   Executed this \_\_\_\_ day of September, 2003.

7  
8                                     
9                                   \_\_\_\_\_  
10                                  Louis F. Agro  
11

# Exhibit A

Pre-Ordering		VZ	CLEC	UNE		Diff.	Perf. Score	Wgt.	Wgt'd. Score			
PO-1-01-6020	Customer Service Record - EDI	0.20	2.74			2.54	0	15	0.000			
PO-1-01-6030	Customer Service Record - CORBA	0.20	0.91			0.71	0	5	0.000			
PO-1-01-6050	Customer Service Record - WEB GUI	0.20	1.21			1.01	0	5	0.000			
PO-1-02-6020	Due Date Availability - EDI	0.96	3.99			3.03	0	5	0.000			
PO-1-02-6030	Due Date Availability - CORBA	0.96	1.64			0.68	0	2	0.000			
PO-1-02-6050	Due Date Availability - WEB GUI	0.96	2.01			1.04	0	2	0.000			
PO-1-03-6020	Address Validation - EDI	3.67	4.74			1.08	0	5	0.000			
PO-1-03-6030	Address Validation - CORBA	3.67	2.79			-0.88	0	2	0.000			
PO-1-03-6050	Address Validation - WEB GUI	3.67	4.59			0.92	0	2	0.000			
PO-1-04-6020	Product and Service Availability - EDI	7.93	11.15			3.21	0	5	0.000			
PO-1-04-6030	Product and Service Availability - CORBA	7.93	NA			0	0	0	0.000			
PO-1-04-6050	Product and Service Availability - WEB GUI	7.93	9.65			1.72	0	2	0.000			
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	4.53	7.69			3.16	0	5	0.000			
PO-1-05-6030	TN Availability and Reservation - CORBA	4.53	5.33			0.79	0	2	0.000			
PO-1-05-6050	TN Availability and Reservation - WEB GUI	4.53	5.18			0.65	0	2	0.000			
PO-2-02-6020	OSS Interface Availability - Prime - EDI		99.91				0	20	0.000			
PO-2-02-6030	OSS Interface Availability - Prime - CORBA		100.00				0	10	0.000			
PO-2-02-6080	OSS Interface Availability - Prime - WEB GUI*		99.41				0	10	0.000			
PO-3-02-3000	% Answered within 30 Seconds - Ordering		83.11				0	10	0.000			
PO-3-04-3000	% Answered within 30 Seconds - Repair		81.08				0	10	0.000			
OR	Ordering			Observations								
OR-1-02-3320	% On Time LSRC - Flow Through - POTS - 2hrs	97.77		79,233		0		20	0.000			
OR-1-04-3100	% On Time LSRC/ASRC - No Facility Check - POTS	92.44		6,664		-1		5	-0.009			
OR-1-04-3210	% On Time LSRC/ASRC - No Facility Check DS0 - Specials	NA				0		0	0.000			
OR-1-06-3320	% On Time LSRC/ASRC - Facility Check - POTS	95.85		410		0		5	0.000			
OR-1-06-3200	% On Time LSRC/ASRC - Facility Check - Specials	100.00		226		0		5	0.000			
OR-2-02-3320	% On Time LSR Reject - Flow Through - POTS	99.12		11,829		0		15	0.000			
OR-2-04-3320	% On Time LSR/ASR Reject - No Facility Check - POTS	96.16		2,449		0		5	0.000			
OR-2-04-3200	% On Time LSR/ASR Reject - No Facility Check - Specials	100.00		2		0		5	0.000			
OR-2-06-3320	% On Time LSR/ASR Reject - Facility Check - POTS	95.76		165		0		5	0.000			
OR-2-06-3200	% On Time LSR/ASR Reject - Facility Check - Specials	NA				0		0	0.000			
OR-4-09-3000	% SOP to Bill Completion Sent w/in 3 Business Days	99.85		56,175		0		15	0.000			
OR-5-03-3000	% Flow Through - Achieved - POTS & Specials	97.48		82,223		0		20	0.000			
PR	Provisioning	VZ	CLEC	VZ	CLEC	VZ	Standard Deviation	Sampling Error	Stat. Score			
PR-3-08-3142	% Completed w/in 5 Days (1-5 lines-No Disp.)-UNE-P/Other	93.06	99.70	82,430	8,035		0.30	22.3704	0	10	0.000	
PR-3-09-3142	% Completed w/in 5 Days (1-5 lines-Dispatch)-UNE-P/Other	92.02	94.65	10,089	878		0.95	2.7545	0	5	0.000	
PR-4-01-3200	% Missed Appointment - VZ - Total - Specials	9.34	3.10	835	129		2.75		0	10	0.000	
PR-4-01-3510	% Missed Appointment - VZ - Total - EEL	9.14	0.00	175	19		6.96		0	10	0.000	
PR-4-01-3530	% Missed Appointment - VZ - Total - IOF	9.09	NA	22					0	0	0.000	
PR-4-02-3100	Average Delay Days - Total - POTS	4.03	2.44	3,756	250	9.16	0.60	2.6492	0	10	0.000	
PR-4-02-3200	Average Delay Days - Total - Specials	6.33	2.50	78	4	12.76	6.54		0	10	0.000	
PR-4-04-3140	% Missed Appt. - Verizon - Dispatch POTS Platform	11.56	5.16	18,458	1,764		0.80	8.0364	0	10	0.000	
PR-4-04-3113	% Missed Appointment - VZ - Dispatch - New Loop	11.56	5.51	18,458	1,616		0.83	7.2955	0	10	0.000	
PR-4-05-3140	% Missed Appt. - Verizon - No Dispatch - POTS Platform	1.32	0.14	122,859	50,217		0.06	19.7333	0	20	0.000	
PR-5-01-3100	% Missed Appointment - Facilities - POTS	1.90	0.74	18,458	3,389		0.26	4.5647	0	10	0.000	
PR-5-01-3200	% Missed Appointment - Facilities - Specials	1.85	1.37	433	146		1.29		0	10	0.000	
PR-5-02-3100	% Orders Held for Facilities > 15 days - POTS	0.10	0.00	18,458	3,389		0.06		0	5	0.000	
PR-5-02-3200	% Orders Held for Facilities > 15 days - Specials	0.23	0.00	433	146		0.45		0	5	0.000	
PR-6-01-3121	% Installation Troubles reported within 30 Days - POTS Platform	3.20	1.33	167,240	61,598		0.08	22.8537	0	15	0.000	
PR-6-01-3200	% Installation Troubles within 30 days - Specials**	1.55	2.33	2,194	172		0.98	-0.5330	0	15	0.000	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut		1.20		1,170				0	15	0.000	
PR-9-01-3520	% On Time Performance - Hot Cut		97.67		688				0	20	0.000	
MR	Maintenance & Repair											
MR-1-01-2000	Average Response Time - Create Trouble	6.74	3.14									
MR-1-03-2000	Average Response Time - Modify Trouble	6.68	3.76									
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	7.65	0.94									
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	62.32	53.38									
MR-2-01-3200	Network Trouble Report Rate - Specials	0.56	1.62	96,316	4,268		0.12	-9.1293	-2	10	-0.034	
MR-2-02-3112	Network Trouble Report Rate - Loop (POTS)	1.42	0.91	2,680,558	361,335		0.02	25.4500	0	10	0.000	
MR-3-01-3112	% Missed Repair Appointments - Loop	15.56	6.99	37,949	3,277		0.66	13.0000	0	20	0.000	
MR-3-02-3100	% Missed Repair Appointments - Central Office*	31.43	37.31	3,083	134		4.10	-1.4363	0	5	0.000	
MR-4-01-3200	Mean Time to Repair - Specials	6.31	5.26	537	69	6.69	0.86	1.2255	0	20	0.000	
MR-4-02-3112	Mean Time to Repair - Loop Trouble	39.18	24.68	37,949	3,277	35.82	0.65	22.2328	0	15	0.000	
MR-4-03-3100	Mean Time to Repair - CO Trouble*	25.70	28.54	3,083	134	31.32	2.76	-1.0269	0	5	0.000	
MR-4-08-3100	% Out of Service > 24 Hours - POTS	56.69	30.52	21,496	2,556		1.04	25.2460	0	20	0.000	
MR-4-08-3200	% Out of Service > 24 Hours - Specials	2.05	0.00	537	64		1.87		0	10	0.000	
MR-5-01-3100	% Repeat Reports w/in 30 days - POTS	15.27	13.48	41,032	3,421		0.84	2.8094	0	15	0.000	
MR-5-01-3200	% Repeat Reports w/in 30 days - Specials	18.62	13.04	537	69		4.98	1.1205	0	15	0.000	
BI	Billing											
BI-1-02-2030	% DUF in 4 Business Days		96.51						0	10	0.000	
		"NA" - No Activity or Results cannot be calculated due to zero in the Denominator		"UD" - under development								
						Totals				-3	584	-0.043

\* Adjusted to 0 based on July/ August performance

\*\* Stat and Performance score determined through permutation test

## RESALE

	Pre-Ordering	VZ	CLEC
PO-1-01-6020	Customer Service Record - EDI	0.20	2.74
PO-1-01-6030	Customer Service Record - CORBA	0.20	0.91
PO-1-01-6050	Customer Service Record - WEB GUI	0.20	1.21
PO-1-02-6020	Due Date Availability - EDI	0.96	3.99
PO-1-02-6030	Due Date Availability - CORBA	0.96	1.64
PO-1-02-6050	Due Date Availability - WEB GUI	0.96	2.01
PO-1-03-6020	Address Validation - EDI	3.67	4.74
PO-1-03-6030	Address Validation - CORBA	3.67	2.79
PO-1-03-6050	Address Validation - WEB GUI	3.67	4.59
PO-1-04-6020	Product and Service Availability - EDI	7.93	11.15
PO-1-04-6030	Product and Service Availability - CORBA	7.93	NA
PO-1-04-6050	Product and Service Availability - WEB GUI	7.93	9.65
PO-1-05-6020	Telephone Number Availability and Reservation - EDI	4.53	7.69
PO-1-05-6030	TN Availability and Reservation - CORBA	4.53	5.33
PO-1-05-6050	TN Availability and Reservation - WEB GUI	4.53	5.18
PO-2-02-6020	OSS Interface Availability - Prime - EDI		99.91
PO-2-02-6030	OSS Interface Availability - Prime - CORBA		100.00
PO-2-02-6080	OSS Interface Availability - Prime - WEB GUI*		99.41
PO-3-02-2000	% Answered within 30 Seconds - Ordering		83.11
PO-3-04-2000	% Answered within 30 Seconds - Repair		81.08

## OR

## Ordering

OR-1-02-2320	% On Time LSRC - Flow Through - POTS - 2hrs	99.78
OR-1-04-2100	% On Time LSRC/ASRC - No Facility Check - POTS	97.19
OR-1-04-2200	% On Time LSRC /ASRC - No Facility Check - Specials	100.00
OR-1-06-2320	% On Time LSRC/ASRC - Facility Check - POTS	100.00
OR-1-06-2200	% On Time LSRC/ASRC - Facility Check - Specials	100.00
OR-2-02-2320	% On Time LSR Reject - Flow Through - POTS	99.97
OR-2-04-2320	% On Time LSR/ASR Reject - No Facility Check - POTS	99.58
OR-2-04-2200	% On Time LSR/ASR Reject - No Facility Check - Specials	100.00
OR-2-06-2320	% On Time LSR/ASR Reject - Facility Check - POTS	100.00
OR-2-06-2200	% On Time LSR/ASR Reject - Facility Check - Specials	NA
OR-4-09-2000	% SOP to Bill Completion Sent w/in 3 Business Days	99.77
OR-5-03-2000	% Flow Through - Achieved - POTS & Specials	97.54

## PR

## Provisioning

	VZ	CLEC	VZ	CLEC
PR-3-08-2100	% Completed w/in 5 Days (1-5 lines - No Dispatch) - POTS	93.06	99.37	82,430
PR-3-09-2100	% Completed w/in 5 Days (1-5 lines - Dispatch) - POTS	92.02	94.15	10,089
PR-4-01-2200	% Missed Appointment - VZ - Total - Specials	9.34	0.00	835
PR-4-02-2100	Average Delay Days - Total - POTS	4.03	2.43	3,756
PR-4-02-2200	Average Delay Days - Total - Specials	6.33	NA	78
PR-4-04-2100	% Missed Appointment - VZ - Dispatch - POTS	11.56	8.02	18,458
PR-4-05-2100	% Missed Appointment- VZ - No Dispatch - POTS	1.32	0.03	122,859
PR-5-01-2100	% Missed Appointment - Verizon - Facilities - POTS - Total	1.90	1.09	18,458
PR-5-01-2200	% Missed Appointment - Facilities - Specials	1.85	0.00	433
PR-5-02-2100	% orders Held for Facilities > 15 Days - POTS - Total	0.10	0.00	18,458
PR-5-02-2200	% Orders Held for Facilities > 15 days - Specials	0.23	0.00	433
PR-6-01-2100	% Installation Troubles reported within 30 Days - POTS - Total	3.20	3.94	187,240
PR-6-01-2200	% Installation Troubles within 30 days - Specials	1.55	0.00	2,194

## MR

## Maintenance &amp; Repair

MR-1-01-2000	Average Response Time - Create Trouble	6.74	3.14
MR-1-03-2000	Average Response Time - Modify Trouble	6.68	3.76
MR-1-04-2000	Average Response Time - Request Cancellation of Trouble	7.65	0.94
MR-1-06-2000	Average Response Time - Test Trouble (POTS only)	62.32	53.38

	VZ	CLEC	VZ	CLEC	Standard Deviation	Sampling Error	Stat. Score	Diff.	Perf. Score	Wgt.	Wgtd. Score
MR-2-01-2200	Network Trouble Report Rate - Specials	0.56	0.31	96,316	1,910		0.17	1,4211	0	10	0.000
MR-2-02-2100	Network Trouble Report Rate - Loop (POTS)	1.42	0.43	2,680,558	88,075		0.04	24,5500	0	10	0.000
MR-3-01-2100	% Missed Repair Appointments - Loop	15.56	10.73	37,949	382		1.86	2,5888	0	20	0.000
MR-3-02-2100	% Missed Repair Appointments - Central Office	31.43	27.78	3,083	18		10.97		0	5	0.000
MR-4-01-2200	Mean Time to Repair - Specials	6.31	2.64	537	6	6.69	2.75		0	20	0.000
MR-4-02-2100	Mean Time to Repair - Loop Trouble	39.18	23.88	37,949	382	35.82	1.84	8,3051	0	15	0.000
MR-4-03-2100	Mean Time to Repair - CO Trouble	25.70	21.08	3,083	18	31.32	7.40		0	5	0.000
MR-4-08-2100	% Out of Service > 24 Hours - POTS	56.69	34.56	21,496	298		2.89	7,6561	0	20	0.000
MR-4-08-2200	% Out of Service > 24 Hours - Specials	2.05	0.00	537	6		5.81		0	10	0.000
MR-5-01-2100	% Repeat Reports w/in 30 days - POTS	15.27	15.75	41,032	400		1.81	-0.2640	0	15	0.000
MR-5-01-2200	% Repeat Reports w/in 30 days - Specials	18.62	0.00	537	6		15.98		0	15	0.000

## BI

## Billing

BI-1-02-2030	% DUF in 4 Business Days	96.51
--------------	--------------------------	-------

\*NA - No Activity or Results cannot be calculated due to zero in the Denominator

\*UD - under development

Totals

0	10	0.000
-2	534	-0.056

\* Adjusted to 0 based on July/ August performance



## Pre-Ordering

VZ CLEC

## DSL

PO-1-06-6020	Facility Available/Loop Qualification - EDI	11.57	3.89
PO-1-06-6050	Facility Available/Loop Qualification - WEBGUI	11.57	3.50
PO-8-01-2000	% On Time - Manual Loop Qualification		96.79
PO-8-02-2000	% On Time - Engineering Record Request		NA

OR

## Ordering

OR-1-04-3341	% On Time LSRC/ASRC - No Facility Check - 2 Wire Digital	100.00
OR-1-04-3342	% On Time LSRC/ASRC - No Facility Check - 2Wire xDSL	100.00
OR-1-04-3340	% On Time LSRC/ASRC - No Facility Check - Line Share	100.00
OR-1-06-3341	% On Time LSRC/ASRC - Facility Check - 2Wire Digital	NA
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check - 2Wire xDSL	NA
OR-1-06-3340	% On Time LSRC/ASRC - Facility Check - Line Share	NA
OR-2-04-3341	% On Time LSR/ASR Reject - No Facility Check - 2Wire Digital	100.00
OR-2-04-3342	% On Time LSR/ASR Reject - No Facility Check - 2Wire xDSL	100.00
OR-2-04-3340	% On Time LSR/ASR Reject - No Facility Check - Line Share	100.00
OR-2-06-3341	% On Time LSR/ASR Reject - Facility Check - 2Wire Digital	NA
OR-2-06-3342	% On Time LSR/ASR Reject - Facility Check - 2Wire xDSL	NA
OR-2-06-3340	% On Time LSR/ASR Reject - Facility Check - Line Share	NA

### Observations

CLEC

22
56
92
4
22
25

VZ

## Standard Sampling

Deviation	Error	Stat. Score
-----------	-------	-------------

Diff.	Perf. Score	Wgt.	Wgt'd. Score
-7.67	0	5	0.000
-8.00	0	5	0.000
	0	5	0.000
	0	0	0.000
	0	2	0.000
	0	10	0.000
	0	10	0.000
	0	0	0.000
	0	0	0.000
	0	0	0.000
	0	2	0.000
	0	10	0.000
	0	10	0.000
	0	0	0.000
	0	0	0.000
	0	0	0.000

**PR**

## Provisioning

PR-3-03-3343	% Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share		98.95		574	Deviation	Error	Stat. Score			
PR-3-03-3343	% Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share	94.00	98.95	4,351	574		1.05	4.6992	0	10	0.000
PR-3-10-3342	% Comp. w/in 6 Days(1-5 lines) Tot. - 2Wire xDSL		97.75		355				0	10	0.000
PR-4-02-3341	Average Delay Days - Total - 2Wire Digital	6.24	1.45	100	11	18.76	5.96		0	2	0.000
PR-4-02-3342	Average Delay Days - Total - 2Wire xDSL	6.85	2.45	53	20	14.95	3.92		0	10	0.000
PR-4-02-3343	Average Delay Days - Total - Line Share	1.90	1.75	104	4	2.22	1.13		0	10	0.000
PR-4-04-3341	% Missed Appointment - Dispatch - 2Wire Digital	13.12	8.04	587	112		3.48	1.4603	0	2	0.000
PR-4-04-3342	% Missed Appointment- Dispatch - 2 Wire xDSL		3.35		418				0	20	0.000
PR-4-04-3343	% Missed Appointment - Dispatch - DSL Line Share	6.98	0.00	874	82		2.94		0	5	0.000
PR-4-05-3343	% Missed Appt. - No Disp. - Line Share	0.53	0.48	5,240	631		0.31		0	20	0.000
PR-6-01-3341	% Installation Troubles w/in 30 Days - 2Wire Digital	6.58	7.75	23,304	129		2.19	-0.5361	0	2	0.000
PR-6-01-3342	% Installation Troubles w/in 30 Days - 2Wire xDSL	6.58	3.35	23,304	507		1.11	2.9002	0	10	0.000
PR-6-01-3343	% Installation Troubles w/in 30 Days - Line Share	1.19	0.28	6,155	719		0.43		0	10	0.000

MR

## Maintenance & Repair

MR-2-02-3341	Network Trouble Report Rate - Loop - 2Wire Digital	1.40	0.98	2,723,169	4,987		0.17	2.5241	0	2	0.000
MR-2-02-3342	Network Trouble Report Rate - Loop - 2Wire xDSL	1.40	0.35	2,723,169	19,669		0.08	12.5714	0	5	0.000
MR-2-02-3343	Network Trouble Report Rate - Loop - Line Share	0.15	0.11	78,223	7,012		0.05	0.8596	0	5	0.000
MR-2-03-3341	Network Trouble Report Rate - CO - 2Wire Digital	0.12	0.12	2,723,169	4,987		0.05	-0.0833	0	2	0.000
MR-2-03-3342	Network Trouble Report Rate - CO - 2Wire xDSL	0.12	0.04	2,723,169	19,669		0.02	3.3750	0	5	0.000
MR-2-03-3343	Network Trouble Report Rate - CO - Line Share	0.05	0.00	78,223	7,012		0.03		0	5	0.000
MR-3-01-3341	% Missed Repair Appt. - Loop - 2Wire Digital	15.81	4.08	38,152	49		5.21		0	2	0.000
MR-3-01-3342	% Missed Repair Appt. - Loop - 2Wire xDSL	15.81	2.35	38,152	85		3.96		0	20	0.000
MR-3-01-3343	% Missed Repair Appt. - Loop - Line Share	42.00	20.00	150	10		16.12		0	20	0.000
MR-3-02-3341	% Missed Repair Appt. - CO - 2Wire Digital	32.17	0.00	3,171	6		19.09		0	2	0.000
MR-3-02-3342	% Missed Repair Appt. - CO - 2Wire xDSL	32.17	14.29	3,171	7		17.67		0	10	0.000
MR-3-02-3343	% Missed Repair Appt. - CO - Line Share	24.66	NA	73					0	0	0.000
MR-4-02-3341	Mean Time To Repair - Loop - 2Wire Digital	39.14	16.56	38,152	49	35.83	5.12	4.4086	0	2	0.000
MR-4-02-3342	Mean Time To Repair - Loop - 2Wire xDSL	39.14	12.86	38,152	85	35.83	3.89	6.7572	0	20	0.000
MR-4-02-3343	Mean Time To Repair - Loop - Line Share	24.62	17.64	150	10	22.17	7.24		0	20	0.000
MR-4-03-3341	Mean Time To Repair - CO - 2Wire Digital	25.76	5.96	3,171	6	31.63	12.93		0	2	0.000
MR-4-03-3342	Mean Time To Repair - CO - 2Wire xDSL	25.76	15.30	3,171	7	31.63	11.97		0	10	0.000
MR-4-03-3343	Mean Time To Repair - CO - Line Share	20.10	NA	73		24.94			0	0	0.000
MR-5-01-3341	% Repeat Reports w/in 30 Days - 2Wire Digital	15.27	29.09	41,323	55		4.85	-2.8469	-2	2	-0.012
MR-5-01-3342	% Repeat Reports w/in 30 Days - 2Wire xDSL	15.27	11.96	41,323	92		3.75	0.8839	0	10	0.000
MR-5-01-3343	% Repeat Reports w/in 30 Days - Line Share **	32.29	50.00	223	10		15.11	-0.8319	0	10	0.000

"NA" - No Activity or Results cannot be calculated due to zero in the Denominator

"UD" - under development

Totals

\* Adjusted to 0 based on July/ August performance

\*\* Stat and Performance score determined through permutation test.

## INTERCONNECTION (TRUNKS)

OR Ordering		CLEC	Obs.	Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations	100.00	4	0	15	0.000
OR-1-13-5020	% On Time Design Layout Record	100.00	41	0	10	0.000
OR-2-12-5000	% On Time Trunk ASR Reject	100.00	4	0	10	0.000

  

PR Provisioning		VZ	VZ	CLEC	VZ Standard Deviation	Sampling Error	Stat. Score		
PR-4-01-5000	% Missed Appointment - VZ - Total	2.04	0.00	5,885	5,182	0.27	0	20	0.000
PR-4-02-5000	Average Delay Days - Total		NA				0	0	0.000
PR-4-07-3540	% On Time Performance - LNP only		98.14		1,776		0	20	0.000
PR-5-01-5000	% Missed Appointment - Facilities	2.04	0.00	5,885	2,638	0.33	0	10	0.000
PR-5-02-5000	% Orders Held for Facilities > 15 Days	2.04	0.00	5,885	2,638	0.33	0	10	0.000
PR-6-01-5000	% Installation Troubles w/in 30 Days	0.12	0.08	5,885	5,182	0.07	0	15	0.000

  

MR Maintenance & Repair									
MR-4-01-5000	Mean Time to Repair - Total**	4.63	5.09	30	15	5.60	1.77	-0.2895	0
MR-5-01-5000	% Repeat Reports w/in 30 Days	10.00	0.00	30	15		9.49		0

  

NP Network Performance									
NP-1-03-5000	# of Final Trunk Groups Blocked 2 months		0					0	20
NP-1-04-5000	# of Final Trunk Groups Blocked 3 months		0					0	0.000
Totals								0	160

## Collocation

### Performance Report for Critical Measure #

12

NP Network Performance		CLEC	Obs.	Wgt.
NP-2-01-6701	% OT Response to Request for Physical Collocation - New	NA		0
NP-2-01-6702	% OT Response to Request for Physical Collocation - Augment	NA		0
NP-2-02-6701	% OT Response to Request for Virtual Collocation - New	NA		0
NP-2-02-6702	% OT Response to Request for Virtual Collocation - Augment	NA		0
NP-2-05-6701	% On Time - Physical Location - New	NA		0
NP-2-05-6702	% On Time - Physical Location - Augment	100.00	8	20
NP-2-06-6701	% On Time - Virtual Location - New	NA		0
NP-2-06-6702	% On Time - Virtual Location - Augment	NA		0
NP-2-07-6701	Average Delay Days - Physical - New	NA		0
NP-2-07-6702	Average Delay Days - Physical - Augment	NA		20
NP-2-08-6701	Average Delay Days - Virtual - New	NA		0
NP-2-08-6702	Average Delay Days - Virtual - Augment	NA		0
				40

"NA" - No Activity or Results cannot be calculated due to zero in the Denominator "UD" - under development

\*\* Stat and Performance score determined through permutation test

			Resale	UNE	Trunks	Collocation	DSL	Total
			%	\$	%	\$	%	\$
1	metric	OSS interface	0%	0	0%	0		
	PO-1-01	Customer Service Record - EDI	X	-	X	-	0%	0
	PO-1-01	Customer Service Record - CORBA	X	-	X	-		
	PO-1-01	Customer Service Record - WEB GUI	X	-	X	-		
	PO-1-06	Facility Available/Loop Qualification - EDI						
	PO-1-06	Facility Available/Loop Qualification - WEB GUI					X	-
	PO-2-02	OSS Interface Availability - Prime - EDI	X	-	X	-	X	-
	PO-2-02	OSS Interface Availability - Prime - CORBA	X	-	X	-		
	PO-2-02	OSS Interface Availability - Prime - WEB GUI	X	ADJ	X	ADJ		
ORDERING								
2		% On Time Ordering Notification	0%	0	5%	13,948		
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs	X	-	X	-	0%	0
	OR-1-04	% On Time LSRC/ASRC - No Facility Check - POTS	X	-	X	-		13,948
	OR-1-04	% On Time LSRC/ASRC - No Facility Check - 2Wire xDSL						
	OR-1-04	% On Time LSRC/ASRC - No Facility Check - Line Share					X	-
	OR-1-06	% On Time LSRC/ASRC - Facility Check - POTS					X	-
	OR-2-02	% On Time LSR Reject - Flow Through - POTS	X	-	X	-		
	OR-2-04	% On Time LSR/ASR Reject - No Facility Check - POTS	X	-	X	-		
	OR-2-04	% On Time LSR/ASR Reject - No Facility Check - 2Wire xDSL						
	OR-2-04	% On Time LSR/ASR Reject - No Facility Check - Line Share					X	-
	OR-2-06	% On Time LSR/ASR Reject - Facility Check - POTS	X	-	X	-	X	-
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Business Days	X	-	X	-		
PROVISIONING								
3		% Completed					0%	0
	PR-3-03	% Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share					X	-
	PR-3-10	% Comp. w/in 6 Days(1-5 lines) Tot. - 2Wire xDSL					X	-
4a	PR-4-01	% Missed Appointment - VZ - Total - EEL			0%	-		
4b		% Missed Appointment	0%	0	0%	0	0%	0
	PR-4-01	% Missed Appointment - VZ - Total - Specials	X	-	X	-		
	PR-4-01	% Missed Appointment - VZ - Total						
	PR-4-02	Average Delay Days - Total - 2Wire xDSL			X	-		
	PR-4-02	Average Delay Days - Total - Line Share					X	-
	PR-4-04	% Missed Appointment - VZ - Dispatch - POTS	X	-			X	-
	PR-4-04	% Missed Appointment - VZ - Dispatch - New Loop			X	-		
	PR-4-04	% Missed Appointment- Dispatch - 2 Wire xDSL						
	PR-4-05	% Missed Appointment- VZ - No Dispatch - POTS	X	-			X	-
	PR-4-05	% Missed Appt. - No Disp. - Line Share					X	-
5	PR-4-05	% Missed Appt. - Verizon - No Dispatch - POTS Platform			0%	-		
6		Hot Cut Performance			0%	0		
	PR-9-01	% On Time Performance - Hot Cut			X	-		
	PR-6-02	% Installation Troubles within 7 days - Hot Cut			X	-		
7	PR-4-07	% On Time Performance - LNP only				0%	-	
MAINTENANCE								
8		Missed Repair Appts.					0%	0
	MR-3-01	% Missed Repair Appt. - Loop - 2Wire xDSL					X	-
	MR-3-01	% Missed Repair Appt. - Loop - Line Share					X	-
9		Mean Time To Repair	0%	0	0%	0	0%	0
	MR-4-01	Mean Time to Repair - Specials	X	-	X	-		
	MR-4-01	Mean Time to Repair - Total						
	MR-4-02	Mean Time to Repair - Loop - 2Wire xDSL			X	-		
	MR-4-02	Mean Time to Repair - Loop - Line Share					X	-
	MR-4-02	Mean Time to Repair - Loop Trouble	X	-	X	-	X	-
	MR-4-03	Mean Time to Repair - CO Trouble	X	-	X	-		
	MR-4-08	% Out of Service > 24 Hours - POTS	X	-	X	-		
10		% Repeat Reports within 30 Days	0%	0	0%	0		
	MR-5-01	% Repeat Reports w/in 30 days - POTS	X	-	X	-	0%	0
	MR-5-01	% Repeat Reports w/in 30 days - Specials						
	MR-5-01	% Repeat Reports w/in 30 Days - 2Wire xDSL	X	-	X	-	X	-
	MR-5-01	% Repeat Reports w/in 30 Days - Line Share					X	ADJ
NETWORK PERFORMANCE								
11		Final Trunk Groups Blocked			0%	0		
	NP-1-03	# of Final Trunk Groups Blocked 2 months			X	-		
	NP-1-04	# of Final Trunk Groups Blocked 3 months			X	-		
12		Collocation					0%	0
	NP-2-01/2	% On Time Response to Request for Collocation					X	-
	NP-2-05/6	% On Time - Collocation					X	-
	NP-2-07/8	Average Delay Days					X	-
# of full share measures in category								
Total			5	-	0	13,948	4	-
							1	-
							7	-
								13,948

ADJ = Adjusted to 0 based on July/ August performance

June 2003

**Special Provision - UNE Ordering**

		% On Time	Observations	Market Adj.
OR-1-04-3100	% OT LSRC/ASRC -No Facil Ck(Elec.-No Flow Thru)-POTS	92.44	6,664	\$ -
OR-1-06-3320	% On Time LSRC/ASRC -Facil Ck(Electronic) - POTS	95.85	410	\$ -
OR-2-04-3320	% OT LSR/ASR Rej.-No Facil Ck (Elec.-No Flow Thru)-POTS	96.16	2,449	\$ -
OR-2-06-3320	% On Time LSR/ASR Reject -Facil Ck (Electronic) - POTS	95.76	165	\$ -

<b>Total Market Adj.*</b>	<b>\$ -</b>
---------------------------	-------------

\* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

**Special Provision - UNE Flow Through**

OR-5-01-3000 % Flow Through - Total - POTS & Specials				OR-5-03-3000 % Flow Through - Achieved - POTS & Specials			
Month	%	Observations Gross #	Flow-thru	Month	%	Observations Gross #	Flow-thru
Apr 03	90.15	65,731	59,258	Apr 03	97.47	60,795	59,257
May 03	86.41	81,473	70,403	May 03	97.89	71,919	70,404
Jun 03	91.42	87,673	80,149	Jun 03	97.48	82,223	80,149
Overall	89.33	234,877	209,810	Overall	97.61	214,937	209,810

<b>Market Adjustment *</b>	<b>\$ -</b>
----------------------------	-------------

\* For allocation, any Flow Through market adjustment is combined with the MOE UNE market adjustment allocation.

**Special Provision - Hot Cut - Loop Performance**

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut	97.67	688	97.67	601
		%Troubles		%Troubles Prior Month	
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut	1.20	1170	1.47	1088

Greater of - Tier I (2 mo) or Tier II (1mo) **Total**

<b>Market Adjustment *</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
----------------------------	-------------	-------------	-------------

\* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

**Special Provision - Electronic Data Interface Measures**

		% On Time	Observations
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	100.00	548
OR-3-02	% Resubmission Not Rejected	NA	

<b>Market Adjustment</b>	<b>\$ -</b>
--------------------------	-------------

		% On Time	Observations	Market Adj.
OR-4-09	% SOP to Bill Completion within 3 Business Days	99.85	60,114	\$ -

<b>Total Market Adj.*</b>	<b>\$ -</b>
---------------------------	-------------

\* For allocation, any EDI market adjustment is allocated to all CLEC's using the EDI interface based on the number of lines in service.

**Change Control Assurance Plan**

June 2003

		% On Time	Observations	Mrkt Adj.
PO-4-01	% Change Management Notices sent on Time (type 3,4,5)	100.00	1	\$ -

\* Cumulative number of delay days greater than 8 standard Delay Days\*

PO-4-03	Change Management Notice Delay 8 plus Days (type 1-5)	NA		\$ -
---------	---	----	--	------

% Test Deck Wgt. Failure Test Deck Wgt.

PO-6-01	% Software Validation	0.00	148	\$ -
---------	-----------------------	------	-----	------

\* Cumulative number of delay hours greater than 48 hour standard Delay Hours\*

PO-7-04	Delay Hours - Failed/Rejected Test Deck Transactions Transactions failed, no workaround	NA		\$ -
---------	---	----	--	------

Total Market Adjustment		\$ -
Resale allocation	18%	\$ -
UNE allocation	82%	\$ -

# Verizon Virginia

## PAP/CCAP Market Adjustment Summary

June 2003

		Weighted Score	Market Adjustment	
<b>MODE OF ENTRY</b>				
	Resale	-0.056	\$ -	
	Unbundled Network Elements	-0.043	-	
	Trunks	0.000	-	
	Digital Subscriber Lines	-0.012	-	
<b>Mode of Entry Total</b>				-
<b># CRITICAL MEASURES</b>				
1	OSS Interface		\$ -	
2	% On Time Ordering Notification		13,948	
3	% Completed		-	
4a	% Missed Appointment - VZ - Total - EEL		-	
4b	% Missed Appointment		-	
5	% Missed Appt. - VZ - No Disp.- Platform		-	
6	Hot Cut Performance		-	
7	% On Time Performance - UNE LNP		-	
8	Missed Repair Appts.		-	
9	Mean Time To Repair		-	
10	% Repeat Reports within 30 Days		-	
11	Final Trunk Groups Blocked		-	
12	Collocation		-	
<b>Individual Rule Payment Total:</b>			<u>205,788</u>	
<b>(Included in <i>Final</i> Monthly Report)</b>				
<b>Critical Measure Total</b>				219,736
<b>SPECIAL PROVISIONS</b>				
	UNE Ordering		-	
	UNE Flow Through (Quarterly)		-	
	UNE Hot Cut Loop		-	
	EDI Measures		-	
<b>Special Provision Total</b>				-
<b>CHANGE CONTROL</b>				-
<b>Grand Total</b>			<u>\$</u>	<u>219,736</u>

## 271 Backslide Market Adjustment Summary - VLR

June 2003

MODE OF ENTRY	Weighted Score	Market Adjustment	Number of Units in Market	Market Adjust. Rate	Number of Units for VLR	Total Market Adjustment for VLR
Resale	-0.06		47,856			
Unbundled Network Elements	-0.04		306,452		105,310	
Trunks	0.00		1,130,399,636		50,331,830	
Digital Subscriber Lines	-0.01		22,232		5,599	

TOTAL MOE \$ to VLR

\$ -

## CRITICAL MEASURES / EDI Special Provision

1 Special Provision - Electronic Data Interface Measures	EDI	208,736		
2 % On Time LSRC - Flow Through - POTS - 2hrs	UNE	0		
2 % On Time LSRC - Flow Through - POTS - 2hrs	RESALE	0		
2 % On Time LSRC/ASRC - No Facility Check - POTS	UNE	13,948	290	48.03
2 % On Time LSRC/ASRC - No Facility Check - POTS	RESALE	5		
2 % On Time LSRC/ASRC - No Facility Check - 2Wire xDSL	DSL	0		
2 % On Time LSRC/ASRC - No Facility Check - Line Share	DSL	0		
2 % On Time LSRC/ASRC - Facility Check - POTS	UNE	4		
2 % On Time LSRC/ASRC - Facility Check - POTS	RESALE	0		
2 % On Time LSR Reject - Flow Through - POTS	UNE	0		
2 % On Time LSR Reject - Flow Through - POTS	RESALE	0		
2 % On Time LSR/ASR Reject - No Facility Check - POTS	UNE	21		
2 % On Time LSR/ASR Reject - No Facility Check - POTS	RESALE	2		
2 % On Time LSR/ASR Reject - No Facility Check - 2Wire xDSL	DSL	0		
2 % On Time LSR/ASR Reject - No Facility Check - Line Share	DSL	0		
2 % On Time LSR/ASR Reject - Facility Check - POTS	UNE	3		
2 % On Time LSR/ASR Reject - Facility Check - POTS	RESALE	0		
2 % SOP to Bill Completion Sent w/in 3 Business Days	UNE	1		
2 % SOP to Bill Completion Sent w/in 3 Business Days	RESALE	0		
3 % Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share	DSL	1		
3 % Comp. w/in 3 Days(1-5 lines No Disp.)- Ln. Share	DSL	1		
3 % Comp. w/in 6 Days(1-5 lines) Tot.- 2Wire xDSL	DSL	0		
4a % Missed Appointment - VZ - Total - EEL	UNE	0		
4b % Missed Appointment - VZ - Total - Specials	RESALE	0		
4b % Missed Appointment - VZ - Total - Specials	UNE	0		
4b % Missed Appointment - VZ - Total	TRUNKS	0		
4b Average Delay Days - Total - 2Wire xDSL	DSL	0		
4b Average Delay Days - Total - Line Share	DSL	0		
4b % Missed Appointment - VZ - Dispatch - POTS	RESALE	1		
4b % Missed Appointment - VZ - No Dispatch - POTS	RESALE	0		
4b % Missed Appointment - VZ - Dispatch - New Loop	UNE	5		
4b % Missed Appointment - Dispatch - 2 Wire xDSL	DSL	2		
4b % Missed Appt. - No Disp. - Line Share	DSL	0		
5 % Missed Appt. - Verizon - No Dispatch - POTS Platform	UNE	8		
6 % On Time Performance / % Troubles Within 7 Days	Hot Cut	3		
7 % On Time Performance - LNP only	TRUNKS	2		
8 % Missed Repair Appt. - Loop - 2Wire xDSL	DSL	0		
8 % Missed Repair Appt. - Loop - Line Share	DSL	0		
9 Mean Time to Repair - Specials	RESALE	0		
9 Mean Time to Repair - Loop Trouble	RESALE	1		
9 Mean Time to Repair - CO Trouble	RESALE	1		
9 % Out of Service > 24 Hours - POTS	RESALE	24		
9 Mean Time to Repair - Specials	UNE	0		
9 Mean Time to Repair - Loop Trouble	UNE	1		
9 Mean Time to Repair - CO Trouble	UNE	31		
9 % Out of Service > 24 Hours - POTS	UNE	3		
9 Mean Time to Repair - Total	TRUNKS	0		
9 Mean Time To Repair - Loop - 2Wire xDSL	DSL	0		
9 Mean Time To Repair - Loop - Line Share	DSL	0		
10 % Repeat Reports w/in 30 days - POTS	RESALE	21		
10 % Repeat Reports w/in 30 days - Specials	RESALE	0		
10 % Repeat Reports w/in 30 days - POTS	UNE	10		
10 % Repeat Reports w/in 30 days - Specials	UNE	0		
10 % Repeat Reports w/in 30 days - 2Wire xDSL	DSL	6		
10 % Repeat Reports w/in 30 Days - Line Share	DSL	2		
11 # of Final Trunk Groups Blocked 2 months	TRUNKS	0		
11 # of Final Trunk Groups Blocked 3 months	TRUNKS	0		
12 % On Time Response to Request for Collocation	COLLOCATION	0		
12 % On Time - Collocation	COLLOCATION	0		
12 Average Delay Days	COLLOCATION	0		

TOTAL Critical Measure \$

\$ -

**VERIZON VIRGINIA INC.**

**PANEL REBUTTAL TESTIMONY OF DONALD ALBERT, PETER D'AMICO,  
ROSEMARIE CLAYTON, AND ALICE SHOCKET**

**NETWORK REARRANGEMENTS (ISSUE C2), LOOP RATES AND CONDITIONING  
(ISSUE C9), DARK FIBER (ISSUE C10), IDLC (ISSUE C14), AND UNE-RELATED  
CHARGES (ISSUE C27)**

**CC DOCKET NO. 02-359**

**OCTOBER 9, 2003**



## **TABLE OF CONTENTS**

	<u>Page</u>
I. WITNESS BACKGROUND .....	1
II. NETWORK REARRANGEMENT (ISSUE C2) (DONALD ALBERT AND PETER D'AMICO) .....	1
III. LOOPS (ISSUE C9) (ROSEMARIE CLAYTON).....	5
IV. DARK FIBER (ISSUE C10) (DONALD ALBERT AND ALICE SHOCKET) .....	10
V. IDLC (ISSUE C14) (DONALD ALBERT AND ROSEMARIE CLAYTON).....	13
VI. UNE-RELATED CHARGES (ISSUE C27) (ROSEMARIE CLAYTON).....	20
VII. CONCLUSION .....	24

**I. WITNESS BACKGROUND**

**Q. PLEASE STATE YOUR NAMES, TITLES AND BUSINESS ADDRESSES.**

A. My name is Donald E. Albert. I am employed by Verizon as Director Network Engineering. My business address is 3011 Hungary Spring Road, Richmond, Virginia. I have previously submitted testimony in this proceeding.

My name is Peter D'Amico. I am a Senior Product Manager in the Interconnection Product Management Group for Verizon. My business address is 416 7<sup>th</sup> Avenue, Pittsburgh, Pennsylvania 15219. I have previously submitted testimony in this proceeding.

My name is Rosemarie Clayton. I am employed by Verizon as Senior Product Manager for xDSL Products and Line Sharing. My business address is 2107 Wilson Blvd., Arlington, Virginia 22201. I have previously submitted testimony in this proceeding.

My name is Alice B. Shocket. I am employed by Verizon as Senior Product Manager – Interconnection Services. My business address is 125 High Street, Boston, Massachusetts. I have previously submitted testimony in this proceeding.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. We respond to the Direct Testimony of Cavalier witnesses Marty Clift, Walter Cole, Chad Edwards, James Vermeulen, Matt Ashenden, Amy Webb, and Jeff Ferrio on issues C2, C9, C10, C14, and C27.

**II. NETWORK REARRANGEMENT (ISSUE C2) (DONALD ALBERT AND PETER D'AMICO)**

**Q. DOES CAVALIER OFFER ANY LEGITIMATE REASON FOR VERIZON TO**